

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 25, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554 Accepted/Files

JUN 252014

Federal Communications Commission Office of the Secretary

Re: WC Docket No. 10-90, WC Docket No. 11-42

2014 ETC Annual Report of Franklin Telephone Co., Inc. Study Area Code 280454

Dear Ms. Dortch:

On behalf of Franklin Telephone Co., Inc. ("Franklin"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Franklin seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan and of outage reporting.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0 7 3 List ABCDE

3 47 C.F.R. §§ 0.457, 0.459, 54.202(a).

Echelon Building II, Suite 200 9430 Research Blvd., Austin, TX 78759 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve, Eagan, MN 55121 phone: 651-452-2660, fax: 651-452-1909 6849 Peachtree Dunwoody Road Bldg. B-3, Suite 200, Atlanta, GA 30328 phone: 770-569-2105, fax: 770-410-1608 547 South Oakview Lane Bountiful, UT 84010 phone: 801-294-4576, fax: 801-294-5124

^{1 47} C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).



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REDACTED FOR PUBLIC INSPECTION

June 25, 2014

Amopted/Files

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

JUN 252014

Federal Communications Commission
Office of the Secretary

Re: WC Docket No. 10-90, WC Docket No. 11-42 2014 ETC Annual Report of Franklin Telephone Co., Inc.

> Study Area Code 280454 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Franklin Telephone Co., Inc. (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

- The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")⁴ and must also report outages, both of which are contained in attachments to the 2014 Report.
- 3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

^{3 47} C.F.R. §§ 54.313, 54.422.

⁴ See In the Matter of Connect America Fund, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."5 Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
- 7. Any previous versions of this information are not publicly available.
- Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

Il Klandell

⁶ See In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, FCC 04-188, rel. Aug. 19, 2004, para. 45.

010> Study Area Code	280454		Account a limit
015> Study Area Name	FRANKLIN TEL CO	- MS	ACCOPIOS/FILES
20> Program Year	2015		
30> Contact Name: Person USAC should co with questions about this data	ntact Tammy Torrey	110.4	JUN 25 2014
35> Contact Telephone Number: Number of the person identified in data	6013843350 ext.		Federal Communications Communication
39> Contact Email Address: Email of the person identified in data lii		apexinc.com	
NUAL REPORTING FOR ALL CARRIERS		1.114	64.313 54.422 Completion Completion Required Required
0> Service Quality Improvement Reporting		(complete attached worksheet)	(check box when complete) ✓
0> Outage Reporting (voice)		(complete attached worksheet)	/
	check box if no outages to report		THE TO V
00> Unfulfilled Service Requests (voice)	0		
0> Detail on Attempts (voice)			ALLEN TO THE PARTY OF THE PARTY
		(attach descript	tive document)
20> Unfulfilled Service Requests (broadband) [0		
30> Detail on Attempts (broadband)			ATTERIOR OF THE PARTY OF THE PA
gos Detail of Attempts (broadband)		(attach descrip	ptive document)
00> Number of Complaints per 1,000 custor	mers (voice)		
10> Fixed 0.0			
20> Mobile			
Number of Complaints per 1,000 custo Fixed 0.0	mers (broadband)		√ IIIIIII
50> Mobile 0.0			
OO> Service Quality Standards & Consumer	Protection Rules Compliance	(check to indicate certification)	1 1
280454MS510.pdf 10>		(attached descriptive document)	✓ ✓ ✓
	* ;		
00> Functionality in Emergency Situations	1.10	(check to indicate certification)	1 1
280454MS610.pdf			
		(attached descriptive document)	
10>			
00> Company Price Offerings (voice)		(complete attached worksheet)	
10> Company Price Offerings (broadband)		(complete attached worksheet)	
00> Operating Companies and Affiliates	_	(complete attached worksheet)	
00> Tribal Land Offerings (Y/N)?	\odot	(if yes, complete attached worksheet)	- Wille
00> Voice Services Rate Comparability		(check to indicate certification)	
010>		(attach descriptive document)	
100> Terrestrial Backhaul (Y/N)? ()	(if not, check to indicate certification)	
110>		(complete attached worksheet)	
200> Terms and Condition for Lifeline Custo		(complete attached worksheet)	
Price Cap Carriers, Proceed to Price Ca Including Rate-of-Return Carriers affil			
00>	ateu with Price Cap Local Exchai	nge Carriers (check to indicate certification)	
05>		(complete attached worksheet)	
Rate of Return Carriers, Proceed to RO	R Additional Documentation Wo	<u>orksheet</u>	
00>		(check to indicate certification)	
005>		(complete attached worksheet)	

	ervice Quality Improvement Reporting illection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	PRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) O O
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.	280454MS100.pdf company is a
	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF)was used to improve service coverage	
<117>	How (USF) was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	

	vice Outage Reporting (Voice) ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torreystelapexinc.com

NORS				<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h>></h>
Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
4					Wo	Noncet					
										464	
	Number	Number Date	Number Date Time	Number Date Time Date	Number Date Time Date Time	(Customers	Customers (Yes / No) See attached	Customers (Yes / No) all that apply) See attached	Customers (Yes / No) all that apply) (Yes / No) See attached	Customers (Yes / No) all that apply) (Yes / No) Resolution See attached

TOBALLE GAVE	ce Offerings including Voice Rate Data lection Form	FCC Form #81 OMB Control No. 8060-0986/OMB Control No. 8060-0819 July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com
<701>	Residential Local Service Charge Effective Date 1/1/2014	
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1></a1>	<a2></a2>	<a3></a3>		Residential Local	403>		Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fe
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1772								
					C-1866 C-1861			
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				See at	tached worksheet			
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					16			

35000	oadband Price Offerings lection Form	ACC Form 481: OMB Control No. 3060-0986 / OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com

			State Regulated		Broadband Service - Download Speed	Broadband Service -	Usage Allowance	Usage Allowance Action Taken When
State	Exchange (ILEC)	Residential Rate	Fees	Total Rate and Fees	(Mbps)	Upload Speed (Mbps)	(GB)	Limit Reached (select
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		+		-				
			- See attac	hed				
	100		- See attac worksheet -				100	
100						-		
- No.								
								2//

	erating Companies lection Form		FCC Form 481 Divid Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		280454
<015>	Study Area Name		FRANKLIN TEL CO - MS
<020>	Program Year		2015
<030>	Contact Name - Person	USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Nur	nber - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address	Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com
<810>	Reporting Carrier	Franklin Telephone Co., Inc.	
<811>	Holding Company	Telapex, Inc.	
<812>	Operating Company	Franklin Telephone Co., Inc.	

cat>	<92>	sab>
Affiliates	SAC	Doing Business As Company or Brand Designation
See a	attached worksh	eet

	bal Lands Reporting lection Form		FCE Form 481. OMB Control No. 3060-0986/OMB Control No. 3060-0819 fully 2013-
<010> <015> <020> <030> <035> <039> <910>	Study Area Code Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line Contact Email Address - Email Address of person identified in data line Tribal Land(s) on which ETC Serves	<030>	PRANKLIN TEL CO - MS 2015 Tammy Torrey 6013843350 ext. tammy.torrey@telapexinc.com
<920>	Tribal Government Engagement Obligation		Name of Attached Document
to confin	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes rm the status described on the attached document(s), on line 920, trates coordination with the Tribal government pursuant to 8(a)(9) includes:	Select (Yes, N	
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	IIII	
<922>	Feasibility and sustainability planning;		
<923>	Marketing services in a culturally sensitive manner;		_
<924>	Compliance with Rights of way processes		-
<925>	Compliance with Land Use permitting requirements		-
<926>	Compliance with Facilities Siting rules		-
<927>	Compliance with Environmental Review processes	-	
<928> <929>	Compliance with Cultural Preservation review processes Compliance with Tribal Business and Licensing requirements.		\dashv
-3237	compliance with most business and accusing requirements.		

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Terrestrial Backhaul Reporting ection Form	FCC form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	
		pers.

Lifeline	erms and Condition for Lifeline Customers ection Form		REC Form 481 OMB Centrol No. 3050-0986/OMB Control No. 3060-0819 Suly 2013
<010>	Study Area Code		280454
<015>	Study Area Name		FRANKLIN TEL CO - MS
<020>	Program Year		2015
<030>	Contact Name - Person USAC should contact regarding this data		Taumy Torrey
<035>	Contact Telephone Number - Number of person identified in data li	ne <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data I	ine <030>	tammy.torrey@telapexinc.com
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		280454MS1200.pdf
			Name of Attached Document
<1220>	Link to Public Website	НТТР	
or the we	heck these boxes below to confirm that the attached document(s), on line 1 state disted, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:		g g
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	/	
<1222>	Details on the number of minutes provided as part of the plan,	/	
<1223>	Additional charges for toll calls, and rates for each such plan.		

Content Cont						
40105 Study Area Code 40105 Study Area Code 40105 Study Area Code 40105 Study Area Mame 40106 Study Area Mame 4010 Study Area Ma	(2000) Pr	rice Cap Carrier Additional Documentation			TCC Form 481	
Study Area Code 200458 2	Data Coll	ection Form		A PARTY OF THE STATE OF	OMB Control No. 3080	0986/OMB Control No. 3060-0819
40105 Study Area Name 40106 Program Yes 40107 Program Yes 40108 Program 40108 Prog	Includina	Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	1.4		Joly 2013	
Study Area Name FINANCIAN TRIL CO - MS 2020 Program Yesr 2011 2030 Contact Mane - Person USAC should contact regarding this data Takeny Tocrey 2035 Contact Replane Number - Number of geron identified in data line <0300 2036 Contact Email Address - Femall Address of person identified in data line <0300 2037 Contact Email Address - Email Address of person identified in data line <0300 2038 Contact Email Address - Email Address of person identified in data line <0300 2039 Contact Email Address - Email Address of person identified in data line <0300 2039 Contact Email Address - Email Address of person identified in data line <0300 2030 Contact Email Address - Ema						
Additional Context Name - Person USAC should contact regarding this data Tempor	<010>	Study Area Code	280454			
CHECK the boxes below to note compliance as a recipient of incremental Connect America Phase I support, frozen High Cost support to offset access charge reductions, and Connect America Phase II support frozen High Cost support. High Cost support to offset access charge reductions, and Connect America Phase II support. Frozen High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Incremental Connect America Phase I reporting 2010- 2014 Year Certification (47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. 2010- 2014 2015 2016 Area Certification (47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. 2012- 2013 2014 Frozen Support Certification (47 CFR § 54.312(a)) 2014 7015 2015 7015 2016 and durure Frozen Support Certification 2015 2016 and durure Frozen Support Certification 2016 2016 2016 2016 2016 2016 2016 2016	<015>	Study Area Name	FRANKLIN TEL CO - MS			
Contact Email Address - Email Address of person identified in data line <0300 tames to the contact Email Address - Email Address of person identified in data line <0300 tames to the contact Email Address - Email Address of person identified in data line <0300 tames to the contact America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Incremental Connect America Phase I reporting Incremental Connect America Phase I reporting 2010 2nd Year Certification (47 CFR § 54.313(b)(1)) 3rd Year Certification (47 CFR § 54.313(b)(1)) 2011 3rd Year Certification (47 CFR § 54.313(b)(1)) 2012 2013 frozen Support Certification 2014 7 2015 7 2015 Frozen Support Certification 2015 2016 and future Frozen Support Certification 2016 2016 Support Certification 2017 3rd Year Connect America ICC Support (47 CFR § 54.313(d)) 2017 3rd Year Connect America ICC Support (47 CFR § 54.313(d)) 2018 3rd Year Goadoband Service Certification 2019 Interim Progress Certification 2010 Interim Progress Certification 2010 Interim Progress Community Anchor Institutions to which began providing access to broadband service in the proceeding Calendary year.	<020>	Program Year	2015	000.00000000000000000000000000000000000		
CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support and the documents attached below is accurate. Incremental Connect America Phase I reporting 2010 2nd Year Certification (47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Incremental Connect America Phase I reporting 2010 2nd Year Certification (47 CFR § 54.313(b)(1)) 2011 3rd Year Certification (47 CFR § 54.313(b)(1)) 2012 2013 Forea Support Certification 2014 2015 Forea Support Certification 2015 2015 Colla and future Frozen Support Certification 2016 2017 2018 2019 Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d)) 2018 2019 2019 2019 2010 2010 2010 2017 2018 2018 2019 2019 2010 2019 2019 2010 2010 2010			Tammy Torrey		1.1.5.4.5.6043843	
CHECK the boxes below to note compliance as a recipient of incremental Connect America Phase I support, frozen High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate. Incremental Connect America Phase I reporting 2010- 2010- 2012- 2013- 2014 Foreor Support Certification (47 CFR § 54.313(b)(1)) 2012- 2013- 2014 Foreor Support Certification 2014- 2015- 2016 and future Frozen Support Certification 2015- 2016- 2016- 2016- 2016- 2017- 2017- 2018- 2017- 2018- 2018- 2018- 2018- 2018- 2018- 2018- 2019- 2018- 2018- 2019- 20			6013843350 ext.	F 5-54-101310 A	7276	1842
Incremental Connect America Phase I reporting 2010 2nd Year Certification (47 CFR § 54.313(b),(2)) 3rd Year Certification (47 CFR § 54.313(b)(1)) 3rd Year Certification (47 CFR § 54.313(b)(2)) 2011 3rd Year Certification (47 CFR § 54.313(b)(2)) 2012 2013 Frozen Support Certification 2013 2014 Frozen Support Certification 2013 2014 Frozen Support Certification 2015 Frozen Support Certification 2015 Certification (47 CFR § 54.313(b)) 2015 Frozen Support Certification 2016 Solven Support Certification 2017 2015 Frozen Support Certification 2018 Certification Support User (554.313(d)) Certification Support User (554.313(e)) 3rd Year Froadband Service Certification Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information prize provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com			
Incremental Connect America Phase I reporting 2010 2nd Year Certification (47 CFR § 54.313(b),(2)) 3rd Year Certification (47 CFR § 54.313(b)(1)) 3rd Year Certification (47 CFR § 54.313(b)(2)) 2011 3rd Year Certification (47 CFR § 54.313(b)(2)) 2012 2013 Frozen Support Certification 2013 2014 Frozen Support Certification 2013 2014 Frozen Support Certification 2015 Frozen Support Certification 2015 Certification (47 CFR § 54.313(b)) 2015 Frozen Support Certification 2016 Support Support Certification 2017 2015 Frozen Support Certification 2018 Certification Support User (5 54.313(d)) Certification Support User (5 54.313(e)) 3rd Year Froadband Service Certification Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information price of the proceeding calendar year. 2010 Interim Progress Community anchor institutions to which began providing access to broadband service in the preceding calendar year.						
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2010b		support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form an	d in the documents attache	d below is accurate.	
2010b						
2010b						
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a)) 2012 2013 Frozen Support Certification 2014 Frozen Support Certification 2015 2016 Frozen Support Certification 2015 2016 Frozen Support Certification 2015 2015 Frozen Support Certification 2015 2016 And future Frozen Support Certification 2016 2016 2016 2016 2016 2016 2016 2016		- BELLEN HER SON HER NOTE HER SON HER				
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2012> 2013 Frozen Support Certification 2014 2015 Frozen Support Certification 2015 Frozen Support Certification 2015 Frozen Support Certification 2016 2016 and future Frozen Support Certification Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d)) Certification Support Used to Build Broadband Connect America Phase II Reporting (47 CFR § 54.313(e)) 3rd year Broadband Service Certification 2018> 5th year Broadband Service Certification 1nterim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information prize unart to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		Price Can Carrier Receiving Frozen Support Cartification (47 CER & E4 212/a)				
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2015		그 내가 가게 있다고 있는데 하는 바다가 하는데 가게 되었다면서 이 사람들이 되었다.				
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Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d)) Connect America Phase II Reporting (47 CFR § 54.313(e)) 2017> 3rd year Broadband Service Certification 2018> 5th year Broadband Service Certification Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		E.5.		⊨		
Connect America Phase II Reporting (47 CFR § 54.313(e)) 2017> 3rd year Broadband Service Certification 2018> 5th year Broadband Service Certification 2019> Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<2015>	2016 and future Frozen Support Certification				
Connect America Phase II Reporting (47 CFR § 54.313(e)) 2017> 3rd year Broadband Service Certification 2018> 5th year Broadband Service Certification 2019> Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))				
Connect America Phase II Reporting (47 CFR § 54.313(e)) 2017> 3rd year Broadband Service Certification 5th year Broadband Service Certification 1019- Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<2016>	[198] 본 경기 (198] 전에 대한 교육 교육 교육 (198] 전에 보고 발생하는 이 경기에 가지 않아보는 하지만 하셨다면 하는 경기를 하는 것이다. (1982) 이 경기를 하는 것이다.				
 3rd year Broadband Service Certification 5th year Broadband Service Certification Interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. 						
 5th year Broadband Service Certification		Connect America Phase II Reporting {47 CFR § 54.313(e)}				
<2019> Interim Progress Certification <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. <2021> Interim Progress Community Anchor Institutions	<2017>	3rd year Broadband Service Certification		—		
Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. Interim Progress Community Anchor Institutions	<2018>	5th year Broadband Service Certification		Щ		
pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. Value	<2019>	Interim Progress Certification				
receding calendar year. <2021> Interim Progress Community Anchor Institutions	<2020>	pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support	shall provide the number, names, and	tion		
<2021> Interim Progress Community Anchor Institutions			ing access to broadband service in the			
				00 01 00 00 00 00 00 00 00 00 00	MICH W/ SWY III - 4	
			ľ			60
Name of Attached Document Listing Required Information	<2021>	Interim Progress Community Anchor Institutions				
Name of Attached Document Listing Required Information			L.			34
Name of Attached Document Listing Required Information						
			Name	of Attached Document List	ing Required Information	•

		REDACTED FOR PUBLIC INSPECTION
3000) R	ate Of Return Carrier Additional Documentation	A PARTY OF A PECC FORMARD AND A PECC FORMARD A PECC
Data Coll	ection Form	OMB Control No. 3060-7385/CMB Control No. 3060-0819
148		July 2013
25		
<010>	Study Area Code	280454
<015>	Study Area Name Program Year	FRANKLIN TEL CO - MS
<030>	Contact Name - Person USAC should contact regarding this data	Z015 Tammy Torrey
<035>	Contact Telephone Number · Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrev@telapexinc.com
CHECK t	he boxes below to note compliance on its five year service quality plan (pursuan	nt to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47
	CFR § 54.313(f)(2). I further certify that the	e information reported on this form and in the documents attached below is accurate.
/2010)	Progress Report on 5 Year Plan	
(3010)	Milestone Certification (47 CFR § 54.313(f)(1)(I))	
		Name of Attached Document Listing Required Information
	Please check this box to confirm that the attached document(s), on line 3	NATION TO STORE DAY STOLEN LIST HEAD OF THE STOLEN STORE STOLEN STOLEN STORE STOLEN STO
(3011)	§ 54.313 (f)(1)(ii), the carrier shall provide the number, names, and address	esses of community anchor institutions to which began
	providing access to broadband service in the preceding calendar year.	
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	
		Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	(Yes/No)
	If yes, does your company file the RUS annual report	(Yes/No)
Please	check these hoves to confirm that the attached document(s) on line 3017	7, contains the required information pursuant to § 54.313(f)(2) compliance requires:
	Electronic copy of their annual RUS reports (Operating Report for	, sontains are required information personality to 3 extensively compliance required.
(3013)	Telecommunications Borrowers)	4
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Car	sh Flows
		280454MS3017.pdf
(3017)	If the response is yes on line 3014, attach your company's RUS annual	
	report and all required documentation	
		Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) IQIQ
(3020)		Salsa Salsa
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a fo	ormat comparable to RUS Operating Report for Telecommunications
	Decimant(a) for Release Sheet Jacobs Statement and Statement of Co.	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Co	-
(3021)	Management letter issued by the independent certified public accountant that	performed the company's financial audit.
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2),	
	contains:	
(3022)	Copy of their financial statement which has been subject to review by an	
(SOLL)	independent certified public accountant; or 2) a financial report in a	
	format comparable to RUS Operating Report for Telecommunications	
	Borrowers,	
(3023)	Underlying information subjected to a review by an independent certified public accountant	
(3024)	Underlying information subjected to an officer certification.	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	ash Flows
(3026)	Attach the worksheet listing required information	
[3020]	- Contract the till and an analytical traction.	
	I.	
	-	

	ion - Reporting Carrier ection Form	FCC Form 481 OMB Control Na. 3050-1986/CARB Control NO. 3060-0819 July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

I certify that I am an officer of the reporting carrier; my respons recipients; and, to the best of my knowledge, the information re	ibilities include ensuring the accuracy of the annual reporting requirements for universal service support eported on this form and in any attachments is accurate.
Name of Reporting Carrier: FRANKLIN TEL CO - MS	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/09/2014
Printed name of Authorized Officer: Tom Griffin	2
Title or position of Authorized Officer: General Manager	
Telephone number of Authorized Officer: 6013845855 ext.	11.54
Study Area Code of Reporting Carrier: 280454	Filing Due Date for this form: 06/30/2014

250 St. 100 St. 200 St.	ori Agent / Certer ection form	PCC Form and " OMB Control No. SDBO-Basis/OMB Contine No. SDBO-Basis July 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent)	is authorized to submit the Information reported on behalf of the reporting ca
also certify that I am an officer of the reporting carrier; agent; and, to the best of my knowledge, the reports ar	sponsibilities include ensuring the accuracy of the annual data reporting requirements provided to the author a provided to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent A	Authorized to File Annual Reports for CAF or LI Recipie	nts on Behalf of Reporting Carrier
[1] 전경 : . [7] :	orized to submit the annual reports for universal service support reporting carrier; and, to the best of my knowledge, the informat	되면 경험 전경 경험을 가지 않는데 있다면 전쟁 사람이 가면 이번 전에 가는 사람이 되었다면 가는데 가게 되었다. 그리고 나를 가게 되었다면 하다 다른데 다음이 되었다면 하다면 하다면 하다면 하다면 하다면 하다면 하다면 하다면 하다면 하
Name of Reporting Carrier:		
Name of Authorized Agent or Employee of Agent:		
Signature of Authorized Agent or Employee of Agent:		Date:
Printed name of Authorized Agent or Employee of Agent:	1000	
Title or position of Authorized Agent or Employee of Agent	Locker and the second s	
Telephone number of Authorized Agent or Employee of Age	ent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

Attachments

REDACTED - FOR PUBLIC INSPECTION

FRANKLIN TELEPHONE COMPANY, INC. (SAC 280454)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

	e Outage Rep tion Form	orting (Vo	oice)							FCC Form 481 OMB Control N July 2013	io. 3060-0986/OMB Cont	rol No. 3060-0819
<010> 5	Study Area Code	e					280454					
Total Victoria and	Study Area Nam						FRANKLIN T	CO - MS				
	Program Year						2015					
	Contact Name -	Person US	AC should cont	act regardi	ng this data		Tammy Torr					
	Contact Telepho					ine <030>	6013843350	xt.				
<039> (Contact Email A	ddress - En	nail Address of	person ide	ntified in data l	ine <030>	tammy.torre	@telapexinc.com				
<220>												
<9>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d>></d>	<e:< td=""><td>></td><td><f></f></td><td><g></g></td><td><h>></h></td></e:<>	>	<f></f>	<g></g>	<h>></h>
NORS Reference Number	Outage Star Date	Outage t Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Out: Description (C all that app	Check	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
		_			-		•			-		
				_			•					
					-	_	-					
1110									30 31			
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									0			
								1000				

Franklin Telephone Co., Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ²

The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

Franklin Telephone Co., Inc. ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Mississippi Public Service Commission which disclose rates, terms, and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers under Title 39 Utilities, Part III rules and Regulations Governing Public Utility Service, Subpart 1, General Rules, and Subpart 3,

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² Id. at para. 28.

³ Id. The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." Id. at n. 71.

Special rules – Telephone Companies, including requirements for customer service, billing, consumer complaints, rates and charges, and slamming, under Mississippi Code Annotated Title 77, Chapter 3 statutes; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Franklin Telephone Co., Inc. is also subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Franklin Telephone Co., Inc.'s demonstration of ability to function in emergency situations for voice and broadband services:

Franklin Telephone Co., Inc. ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and in accordance with the orders in Mississippi Public Service Commission Docket No. 2005-AD-662. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically in accordance with the orders in Mississippi Public Service Commission Docket No. 2005-AD-662, Franklin Telephone Co., Inc. has a reasonable amount of backup power to ensure functionality without an external power source, is able to reroute traffic and manage traffic spikes. In addition, Franklin Telephone Co., Inc. has comprehensive emergency operations plans in place and will adhere to FCC reporting requirements regarding outages and provide copies of such reports to the Mississippi Commission upon request.

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

CONTRACTOR OF THE PARTY OF THE	ce Offerings including Voice Rate Data lection Form	FCC Form 481 DM8 Control No. 3060-0986/OMB Control No. 3060-0819 Aut/ 2013
<010>	Study Area Code	280454
<015>	Study Area Name	FRANKLIN TEL CO - MS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tammy Torrey
<035>	Contact Telephone Number - Number of person identified in data line <030>	6013843350 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tammy.torrey@telapexinc.com
<701>	Residential Local Service Charge Effective Date 1/1/201	4
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1></a1>	<a2> Exchange (ILEC)</a2>	SAC (CETC)	 Rate Type	Residential Local Service Rate	 State Subscriber Line Charge	<04> State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee
MS	All Exchanges		FR	14.0	0.0	0.0	0.0	14.0
MS	All		MS	13.0	0.0	0.0	1.86	14.86